



## Indiana Department of Education

Dr. Katie Jenner, Secretary of Education

**To:** Indiana State Board of Education

**From:** Office of Accountability, Indiana Department of Education

**Date:** July 7, 2021

**Subject:** Excessive Home School Audit Process for IC 20-26-13-10(b)

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This memorandum outlines the proposed process to implement IC 20-26-13-10(b). Indiana Department of Education (Department) recommends the adoption of this process by the Indiana State Board of Education (Board).

### **Background**

Public Law 159-2019 added the requirement that any high school with a high percentage of students leaving the high school's cohort to attend homeschool must submit a request to the Board to allow these students to be removed from the cohort instead of being considered "dropouts".

Specifically, IC 20-26-13-10(b) provides that any high school where a significant percentage of students in the cohort were removed to attend homeschool and not on track to graduate at the time of removal must submit a request to the Board to request these students be considered mobile and not considered dropouts. The Board must review the request and deny such request if the high school fails to demonstrate "good cause" to justify the student's mobility to homeschool. Any student for which a request is denied by the Board shall be returned to the high school's cohort and considered a "dropout" for purposes of graduation rate calculations.

On January 17, 2020, the Department provided notice to schools and school corporations that this new process would be carried out beginning with the 2020 cohort. In preparation for such information, the Department published a "Homeschool Exit Report" for the 2019 cohort, which included data and information on students who were removed from any public or nonpublic school to attend homeschool. For the audit of the 2020 cohort, the Department identified 104 high schools that met the minimum threshold established by statute to be subject to the excessive homeschool audit. The Department notified these schools in July 2020, three (3) months in advance, of their required participation in the audit. The notice also included information on how many students were subject to the audit, how to identify which students were subject to the audit, and what documentation was required to support each student's status as "exited to homeschool" and "on-track".

### **Review Process**

The Department recommends the implementation of the following process to carry out IC 20-26-13-10(b).

1. Department staff compiles a list of all high schools that satisfy one of the following:
  - a. For a cohort of 100 students or less, at least ten percent (10.0%) of the students in the cohort were mobilized to homeschool, where the denominator equals the total number



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- of students who were ever in the school's cohort over the term of the respective cohort and were not moved to another Indiana school's cohort, and the numerator equals the total number of students in the cohort who were identified as mobilized to homeschool once the cohort locks.
- b. For a cohort of more than 100 students, at least five percent (5.0%) of the students in the cohort were mobilized to homeschool, where the denominator equals the total number of students who were ever in the school's cohort over the term of the respective cohort and were not moved to another Indiana school's cohort, and the numerator equals the total and the numerator equals the total number of students in the cohort who were identified as mobilized to homeschool once the cohort locks.
2. Department staff notifies each high school identified under (1) that it must provide documentation for each student in the cohort who was ever mobilized to homeschool. To be deemed "sufficient" and demonstrating "good cause", the high school must provide documentation demonstrating the mobilization to homeschool was initiated and approved by the parent, and documentation demonstrating that the student was "on track" to graduate at the time of mobilization to homeschool. To satisfy these requirements, the high school must submit the following documentation to the Department by the stated deadline:
    - a. Board-adopted "withdrawal to non-accredited nonpublic school" form required under IC 20-33-2-28.6, signed and dated by the parent and explicitly indicating the pursuance of homeschool.
    - b. Student's transcript indicating the number of credits earned at the time of withdrawal to homeschool. To be considered "on track" to graduate, the student must have completed and earned credits based on the following schedule:
      - i. At least ten (10) credits must be earned by a student who mobilized after the completion of the freshman year (9th grade).
      - ii. At least twenty (20) credits must be earned by a student who mobilized after the completion of the sophomore year (10th grade).
      - iii. At least thirty (30) credits must be earned by a student who mobilized after the completion of the junior year (11th grade).
      - iv. At least thirty (30) credits must be earned by a student who mobilized after the completion of the first semester of the senior year (12th grade).
      - v. At least thirty-five (35) credits must be earned by a student who mobilized during the second semester of the senior year (12th grade).
  3. Department staff reviews all documentation to determine whether a school has demonstrated good cause for each student.
  4. Department staff notifies each high school identified under (1) of the total number of students reviewed for which good cause was or was not demonstrated. Each high school identified under (1) is provided with the opportunity to review the Department's findings;



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however, the high school will not be afforded the opportunity to provide supplemental information beyond the initial information submitted.

5. All findings and recommendations are brought forward to the Board for approval.
6. Any student for which good cause was not demonstrated shall be returned to the school's cohort and considered a "dropout" for purposes of graduation rate.

### **Timeline**

To promote efficiency, the Department recommends this process be carried out in conjunction with the mandatory graduation rate audit conducted pursuant to IC 20-26-13-11.

Schools will be afforded at least two months to gather and submit the required documentation. The Department will review all submissions in a timely manner and bring forth all findings and recommendations to the Board for approval no later than the January business meeting. All graduation rates must be final by January 15th annually.